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26 Inc.; Hotels.com, LP; Hotel Tonight, Inc.; Hotwire, Inc.; Kayak Software Corp.;
27 Orbitz, LLC; Travelocity.com, LP; Fandango, Inc.; StubHub, Inc.; Ticketmaster
28 LLC; Live Nation Entertainment, Inc.; and Micros Systems, Inc.

17 **UNITED STATES DISTRICT COURT**
18
19 **SOUTHERN DISTRICT OF CALIFORNIA**

AMERANTH, INC.,

Plaintiff,

v.

ORBITZ, LLC,

Defendant.

Civil Action No. 12-CV-1644-JLS-NLS

[Consolidated with 3:11-CV-01810-JLS-NLS]

**DECLARATION OF YEVGENIY
KORABELNIKOV ON BEHALF OF
ORBITZ, LLC**

**FILED UNDER SEAL PURSUANT TO
PROTECTIVE ORDER – CONTAINS
INFORMATION DESIGNATED “HIGHLY
CONFIDENTIAL – ATTORNEYS’ EYES
ONLY”**

**DECLARATION OF YEVGENIY KORABELNIKOV ON BEHALF OF ORBITZ,
LLC**

I. INTRODUCTION

1. I serve as Technical Manager for Orbitz. I have personal knowledge of the matters stated in this declaration.

2. I understand that the Plaintiff seeks to require Orbitz to produce all of the source code and associated tools and files for the full and mobile versions of its e-commerce website ("the websites"), such that the Plaintiff could set-up and execute fully-functioning versions of the websites and/or full test environments for the websites.

3. I am offering this declaration to explain:

- a. the effort Orbitz's employees would have to undertake to gather some of the materials requested;
- b. why it would be difficult or impossible for Orbitz to provide some of the materials requested;
- c. why it would be difficult or impossible to set-up fully-functioning versions of the websites and/or full test environments at the Plaintiff's location; and
- d. what Orbitz proposes as a more reasonable source code production in this matter.

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